

# **Exhibit B**

# **Exhibit B**

## Composite Exhibit B

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**From:** Mike Belotz <mbelotz@tecumsehhalts.com>  
**Sent:** Thursday, June 2, 2022 5:40 PM  
**To:** Michael Stone; Steven Pelosi  
**Cc:** Napoli, Michael (Ptnr-Dal); Bart Larsen; Chad Meyer; Maggie Jenkins; Alison Francis; Igor Shleypak; Andre Bahbah; Steven Pelosi; John Gordon  
**Subject:** RE: Infinity Capital Management/Preva Advanced Surgicare  
**Attachments:** HASOverlapDumpWithIncome-Final.xlsx

Michael,

To formulate a fair split on the overlap receivables it is clear that having the underlying backup for the data on the attached spreadsheets is helpful. So we can understand exactly what backup is available can you clarify what you have, if anything for the following:

Bill Cost  
 Bill GFB  
 Total Procedure GFB

Also, please let us know if there is any other backup you have for any other column of financial data. Thanks.

MB

---

**From:** Michael Stone <mstone@provepartners.com>  
**Sent:** Wednesday, May 25, 2022 9:26 PM  
**To:** Mike Belotz <mbelotz@tecumsehhalts.com>; Steven Pelosi <SPelosi@provepartners.com>  
**Cc:** michael.napoli@akerman.com; Bart Larsen <blarsen@shea.law>; Chad Meyer <cmeyer@tecumsehhalts.com>; Maggie Jenkins <MJenkins@tplcmgmt.com>; Alison Francis <afrancis@tplcmgmt.com>; Igor Shleypak <ishleypak@hedgeact.com>; Andre Bahbah <ababab@provepartners.com>; Steven Pelosi <SPelosi@provepartners.com>; John Gordon <jgordon@provepartners.com>  
**Subject:** Re: Infinity Capital Management/Preva Advanced Surgicare

Understand, I'm certain your message is well received by all parties herein. We will proceed as you've instructed here.

@Steven Pelosi — pls proceed with releasing non-overlapping funds.

Michael

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**From:** Mike Belotz <mbelotz@tecumsehhalts.com>  
**Sent:** Wednesday, May 25, 2022 1:07:24 PM  
**To:** Michael Stone <mstone@provepartners.com>  
**Cc:** michael.napoli@akerman.com <michael.napoli@akerman.com>; Bart Larsen <blarsen@shea.law>; Chad Meyer <cmeyer@tecumsehhalts.com>; Maggie Jenkins <MJenkins@tplcmgmt.com>; Alison Francis <afrancis@tplcmgmt.com>; Igor Shleypak <ishleypak@hedgeact.com>; Andre Bahbah <ababab@provepartners.com>; Steven Pelosi <SPelosi@provepartners.com>; John Gordon <jgordon@provepartners.com>  
**Subject:** RE: Infinity Capital Management/Preva Advanced Surgicare

Michael,

We've seen the motion that HAS filed on Monday this week. To be clear, we have no issue with TPL releasing funds relating only to HAS receivables. However, we had no backup to show if any of the collected overlap receivables in fact belonged only to HAS until I received your email last Friday May 20 at 8:40 PM ET. From that email I now understand that Willie Lennon and Tyrone Martin are solely HAS receivables and on whom we understand we hold no receivables. To the extent that TPL receives funds on non-overlap receivables belonging to HAS, Tecumseh has no issue with TPL releasing those funds. We continue to have a dispute with HAS as to the proper way to allocate payments related solely to the overlap receivables.

Best,  
MB

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**From:** Michael Stone <mstone@provepartners.com>

**Sent:** Friday, May 20, 2022 8:40 PM

**To:** Mike Belotz <mbelotz@tecumsehhalts.com>

**Cc:** michael.napoli@akerman.com; Bart Larsen <blarsen@shea.law>; Chad Meyer <cmeyer@tecumsehhalts.com>;

Maggie Jenkins <MJenkins@tplcmgmt.com>; Alison Francis <afrancis@tplcmgmt.com>; Igor Shleypak

<ishleypak@hedgeact.com>; Andre Bahbah <abahbah@provepartners.com>; Steven Pelosi

<SPelosi@provepartners.com>; John Gordon <jgordon@provepartners.com>

**Subject:** RE: Infinity Capital Management/Preva Advanced Surgicare

Mike et al –

Please find attached (and pasted in-line below) a breakdown of the amounts held on deposit for dates of service that are not part of the Holders' portfolio as well as the (proposed) calculations of pro rata splits. To the extent that you disagree with the pro rata calculation using outstanding gross billed charges (*which we view as the appropriate approach*), please confirm how you'd like us to proceed.

Michael Stone

**TPL Claims Management, LLC**  
**Amounts held on deposit for Gain Servicing**  
**5/20/2022**

Patient:

**Outstanding Gross Billed Charges (\$)**

Infinity Holders	\$	-	\$	-	\$	7,919.72	\$	1,333.00	\$
HASelect Only (DOs serviced by Gain)	\$	-	\$	-	\$	131,369.38	\$	8,794.03	\$
Total	\$	-	\$	-	\$	139,489.10	\$	10,387.03	\$

**Outstanding Gross Billed Charges (%)**

Infinity Holders	PA	PA	5%	15%
HASelect Only (DOs serviced by Gain)	100%	100%	93%	83%

Total Settlement Amount	\$	4,200.00	\$	40,500.00	\$	125,000.00	\$	3,700.00	\$
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**Pro Rata Amount Due\***

Infinity Holders	\$	-	\$	-	\$	6,207.10	\$	874.18	\$
HASelect Only (DOs serviced by Gain)	\$	4,200.00	\$	40,500.00	\$	118,792.90	\$	4,823.82	\$

CHECK		0		0		0		0	
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\* Payments applied pro rata based on total outstanding gross billed charges



**Michael Stone**  
**Chief Executive Officer**  
 10100 W. Charleston Blvd, Suite 120  
 Las Vegas, NV 89135  
 Phone: 213-700-4764  
 Email: [mstone@provepartners.com](mailto:mstone@provepartners.com)  
 Web: [www.provepartners.com](http://www.provepartners.com)



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**From:** Mike Belotz <[mbelotz@tecumsehahalts.com](mailto:mbelotz@tecumsehahalts.com)>

**Sent:** Tuesday, May 17, 2022 9:39 AM

**To:** John Gordon <[jgordon@provepartners.com](mailto:jgordon@provepartners.com)>; Michael Stone <[mstone@provepartners.com](mailto:mstone@provepartners.com)>

**Cc:** [michael.napoli@akerman.com](mailto:michael.napoli@akerman.com); Bart Larsen <[blarsen@shea.law](mailto:blarsen@shea.law)>; Chad Meyer <[cmeyer@tecumsehahalts.com](mailto:cmeyer@tecumsehahalts.com)>; Maggie Jenkins <[MJenkins@tplcmgmt.com](mailto:MJenkins@tplcmgmt.com)>; Alison Francis <[afrancis@tplcmgmt.com](mailto:afrancis@tplcmgmt.com)>; Igor Shleypak

<ishleypak@hedgeact.com>

**Subject:** RE: Infinity Capital Management/Preva Advanced Surgicare

Michael,

To get these overlap claims settled we'd like to see detail on the proposed amount being sent to GAIN. I don't believe any details were provided except for the proposed amount. Specifically:

- The patients at issue. Through our lawyers we understand six patients make up the amount of which two are non-overlap receivables and solely HA receivables. Please confirm.
- On the overlap receivables the total amount of receivables attributable to HA versus the portfolio.
- The basis of calculation for attributing the settlements.

Thanks.

Best,  
MB



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**From:** Michael Stone <mstone@provepartners.com>  
**Sent:** Tuesday, June 7, 2022 12:37 AM  
**To:** Mike Belotz; Steven Pelosi  
**Cc:** Napoli, Michael (Ptnr-Dal); Bart Larsen; Chad Meyer; Maggie Jenkins; Alison Francis; Igor Shleypak; Andre Bahbah; Steven Pelosi; John Gordon  
**Subject:** RE: Infinity Capital Management/Preva Advanced Surgicare

Mike et al –

Thanks for your note below. We will provide a thorough response by Wednesday close of business. I was traveling last week and am now getting caught up.

Michael Stone

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**From:** Mike Belotz <mbelotz@tecumsehhalts.com>  
**Sent:** Thursday, June 2, 2022 2:40 PM  
**To:** Michael Stone <mstone@provepartners.com>; Steven Pelosi <SPelosi@provepartners.com>  
**Cc:** michael.napoli@akerman.com; Bart Larsen <blarsen@shea.law>; Chad Meyer <cmeyer@tecumsehhalts.com>; Maggie Jenkins <MJenkins@tplcmgmt.com>; Alison Francis <afrancis@tplcmgmt.com>; Igor Shleypak <ishleypak@hedgeact.com>; Andre Bahbah <abahbah@provepartners.com>; Steven Pelosi <SPelosi@provepartners.com>; John Gordon <jgordon@provepartners.com>  
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